

United States District Court

for the

Western District of New York

United States of America

Case No. 22-MJ-- 4077

v.

JACOB M. RITCHIE,

Defendant

CRIMINAL COMPLAINT

I, JUSTIN J. BURNHAM, the complainant in this case, state that the following is true to the best of my knowledge and belief: That between in or about November 4, 2021 through February 16, 2022, in the Western District of New York and elsewhere, the defendant, JACOB M. RITCHIE:

(1) did knowingly attempt to employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which depictions were transported in and affecting interstate and foreign commerce, including by computer, in violation of 18 U.S.C. §§ 2251(a) and (e);

(2) did knowingly distribute, receive and attempt to receive, child pornography that had been transported in and affecting interstate and foreign commerce, including by computer, in violation of 18 U.S.C. § 2252A(a)(2)(A); and

(3) did knowingly possess and access with intent to view, and attempt to possess and access with intent to view, material that contained images of child pornography, that had been transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, including by computer, and that were produced using materials that had been shipped and transported in and affecting interstate and foreign commerce, in violation of 18 U.S.C. § 2252A(a)(5)(B).

SEE ATTACHED AFFIDAVIT OF SPECIAL AGENT JUSTIN J. BURNHAM, HSI.

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.



Complainant's signature

JUSTIN J. BURNHAM, Special Agent, (HSI)

Printed name and title

Affidavit and Criminal Complaint submitted electronically
by email in .pdf format. Oath administered, and contents
and signature, attested to me as true and accurate
telephonically pursuant to Fed.R.Crim. P. 4.1 and 4(d) on:

Date: May 27 , 2022

City and State: Rochester, New York

Marian W. Payson
Judge's signature
MARIAN W. PAYSON
UNITED STATES MAGISTRATE JUDGE
Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF MONROE)
CITY OF ROCHESTER)

22-MJ-4077

JUSTIN J. BURNHAM, being duly sworn, deposes and states:

1. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI). I have been employed as a Special Agent since October 2008. I am currently assigned to the Buffalo, New York office and am responsible for investigating child exploitation and child pornography crimes, to include violations of 18 U.S.C. §§ 2251(a) (production of child pornography); 2252A(a)(2)(A) (receipt and distribution of child pornography); and 2252A(a)(5)(B) (possession of child pornography).

2. This affidavit is submitted in support of a criminal complaint, which alleges that Jacob RITCHIE, while in the Western District of New York, did knowingly violate 18 U.S.C. §§ 2251(a) (production and attempted production of child pornography); 2252A(a)(2)(A) (distribution, receipt, and attempted receipt of child pornography); and 2252A(a)(5)(B) (possession and attempted possession of child pornography).

3. The information contained in this affidavit is based upon my personal knowledge and investigation of this matter, my training and experience, conversations with other law enforcement officers and witnesses, my review of documents and records, and my review of computer forensic findings. Because this affidavit is being submitted for the limited purpose of establishing probable cause to secure a criminal complaint, I have not included every fact known to me concerning this investigation. Rather, I have set forth facts necessary to establish probable cause to believe that RITCHIE knowingly violated 18 U.S.C. §§ 2251(a), 2252A(a)(2)(A), and 2252A(a)(5)(B).

November 2021 NYSP undercover interaction with Meet24 user “j”

4. On November 4, 2021, an undercover New York State Police (NYSP) investigator in the Western District of New York (the UC) was investigating the online messaging and dating application “Meet24.” Meet24 is known to law enforcement as a platform on which individuals engage in the exploitation of minors, to include the production, distribution, and receipt of child pornography. Meet24 operates via the internet, and therefore operates in and affecting interstate and foreign commerce.

5. On November 4, 2021, the UC was contacted by a user with the account name “j.” According to “j’s” Meet24 profile, he was an 18-year-old male near Wolcott, NY. “J” started the chat by asking “r u really 18,” to which the UC replied, “No Im 12. It wont let me put my realy ago so i had 2 put that.”¹ “J” continued to communicate with the UC, despite being told that the UC was a minor. The conversation quickly became sexual in nature. “J” stated that he was a 36-year-old male and asked the UC if she “ever had sex or done anything sexual with a family member.” “J” also asked the UC to send “j” a picture of “just u naked or with stuff in ur pussy,” in violation of 18 U.S.C. §§ 2251(a), 2252A(a)(2)(A), and 2252A(a)(5)(B).

6. After the initial conversation described above, the UC exchanged phone numbers with “j,” at which point additional conversation took place via text messaging. “J” ultimately identified himself as “Jacob” from Wolcott, NY, and sent a photograph of himself to the UC. Based on the photograph, the NYSP identified “Jacob” as registered sex offender

¹ In order to join Meet24, the UC’s public profile page indicated that the UC was 18 years old. The profile, however, contained a photograph of an apparent 12-year-old female. As indicated above, when contacted, the UC immediately told “j” that the UC was a 12-year-old minor.

and current New York State parolee Jacob M. RITCHIE, DOB: XX/XX/1985, with a known address of 6086 Lake Ave, Wolcott, NY.

7. From November 4, 2021, through November 25, 2021, RITCHIE exchanged hundreds of messages with the UC, acknowledging on several occasions his belief that the UC was a minor. RITCHIE frequently discussed meeting in-person to have sex with the child and repeatedly asked the UC to produce and send him child pornography depicting her “pussy” in violation of 18 U.S.C. §§ 2251(a), 2252A(a)(2)(A) and 2252A(a)(5)(B). Below is an example of such an exchange between the UC and RITCHIE (RITCHIE is designated as “Incoming” and the UC is designated as “Outgoing”):

2021/11/04	10:12:56 AM ED	680-202-9222	SMS	Incoming	Do u want me to have sex with you
2021/11/04	10:14:44 AM ED	680-202-9222	SMS	Outgoing	Oh like idk i nevs done that b4. Like u really think Im
2021/11/04	10:15:55 AM ED	680-202-9222	MMS	Incoming	
2021/11/04	10:16:59 AM ED	680-202-9222	SMS	Incoming	Yes ur beautiful
2021/11/04	10:17:29 AM ED	680-202-9222	SMS	Incoming	Have you ever watched porn
2021/11/04	10:21:37 AM ED	680-202-9222	SMS	Outgoing	Thanks! U r cute 2
2021/11/04	10:21:44 AM ED	680-202-9222	SMS	Outgoing	No i nevs watched porn b4
2021/11/04	10:21:55 AM ED	680-202-9222	SMS	Incoming	Thanks
2021/11/04	10:22:32 AM ED	680-202-9222	SMS	Incoming	Can u go in the bathroom n take a pic of ur pussy
2021/11/04	10:22:42 AM ED	680-202-9222	SMS	Incoming	Ttyl got to do some work
2021/11/04	10:22:52 AM ED	680-202-9222	SMS	Outgoing	Not rn Im in school!

8. In another such exchange on November 6, 2021, RITCHIE asked the UC to produce a video depicting the child inserting a marker into her vagina. RITCHIE wrote, “Put the marker near ur pussy,” and “Slowly push it in ur pussy.” RITCHIE continued: “[h]ow far in is it” and “[c]an I see” as well as “[r] u thinking the marker is my dick going in ur pussy.” RITCHIE also sent photographs of himself to the UC, to include photos of his erect penis.

9. RITCHIE engaged in such communications on a daily basis from November 4, 2021, through November 11, 2021, and then on a more sporadic basis until the communications ceased on November 25, 2021.

December 2021 NYSP undercover interaction with Meet24 user “o”

10. On December 26, 2021, the UC was still posing as the same 12-year-old female on Meet24, when he was contacted by the Meet24 user “o.” “O’s” public profile indicated that he was 20 years old and was located near Black Creek, NY.

11. At the beginning of the conversation, “o” asked “how old are you,” to which the UC replied “12. How old r u.” “O” replied “is it a problem if 36,” to which the UC stated “No idc [acronym for ‘I don’t care’] if u don’t care im 12.” “O” then asked the UC for a picture. In response, the UC sent a photograph of the same apparent 12-year-old female that the UC previously sent to RITCHIE when RITCHIE was using the account “j.” In response, “o” replied with a picture of RITCHIE, at which point the UC realized that he was again communicating with the defendant, Jacob RITCHIE.² The UC and RITCHIE then exchanged greetings, and the conversation switched to text messaging.

12. RITCHIE exchanged text messages with the UC from December 26, 2021, through December 29, 2021, during which time RITCHIE again acknowledged his belief that the UC was a child, and again asked the UC to produce and send him child pornography in violation of 18 U.S.C. §§ 2251(a), 2252A(a)(2)(A), and 2252A(a)(5)(B). For example, on December 26, 2021, RITCHIE asked the UC to send him “naked pics . . . [l]ike pics of ur pussy.” RITCHIE asked if the UC wanted RITCHIE to send her pictures of “young girls”

² Based on the conversation, it is clear that RITCHIE recognized the UC’s profile and believed he was talking to the same minor as before.

and sent an image of child pornography depicting a prepubescent female child's nude vagina in violation of 18 U.S.C. § 2252A(a)(2)(A). After sending the photograph, RITCHIE stated "[t]hat a pic of a young girls pussy" and "would u take a pic like that of u" . . . "[w]ish you would send pics of u naked," in violation of 18 U.S.C. § 2251(a).

13. RITCHIE proceeded to send two additional images of child pornography to the UC, to include an image of an approximately 8-year-old female's nude vagina, and an image depicting an approximately 10-year-old female being subjected to vaginal intercourse by an adult male, all in violation of 18 U.S.C. § 2252A(a)(2)(A).

14. On the following day, December 27, 2021, RITCHIE persisted in attempting to have the UC produce child pornography by stating: "[u] won't take naked pics anyways" and "[d]o u want to put stuff in ur pussy while in the phone with no one there but u." RITCHIE further stated: "[d]o u want me to do anything with ur daughter lol" and "[t]old my sister I'm not babysitting my niece anymore after what I caught my niece doing multiple times."³ RITCHIE further stated: "[l]ike play with ur daughter's pussy or anything else." RITCHIE then stated: "[r]eally want pics of ur pussy but u wont." RITCHIE then discussed meeting with the UC and said: "if anyone sees me with u I could go to jail."

15. RITCHIE further stated: "[w]ant pics of ur pussy n things in ur pussy before I try to find a way to hang out with u alone," and "[i]f u send pics of ur pussy and stuff in ur pussy I promise I would never show anyone . . . [w]ould u put a hairbrush handle in ur pussy on the phone" and "how bad do u want me come be with u alone n do stuff to u."

³ Law enforcement is actively investigating whether RITCHIE had recent access to minor children in light of this comment.

16. A subpoena response from Meet24 revealed the following subscriber information among other informatoin for Meet24 user “o”:

name:	o
registration date:	2021-12-21 09:57:02
registration IP:	72.230.188.75
last login:	2021-12-28

17. A subpoena response from Charter Communications revealed that IP address 72.230.188.75 was registered to RITCHIE’s address at 6086 Lake Avenue in Wolcott, New York during the time that RITCHIE communicated with the UC.

February 16, 2022 Search Warrant at RITCHIE’S residence

18. Based on the above, on February 16, 2022, the NYSP executed a search warrant at RITCHIE’s residence at 6086 Lake Ave, Wolcott, NY. RITCHIE was present at the home and was interviewed at the NYSP barracks in Wolcott, NY, following the execution of the warrant. After waiving his *Miranda* rights, RITCHIE admitted that he was responsible for engaging in the sexually explicit communications described above with the UC. RITCHIE also admitted that he sent the child pornography described above to the UC during the communications. RITCHIE was shown printed copies of the child pornography and confirmed that they were the images that he sent to the UC. RITCHIE told investigators that he kept a cell phone containing child pornography under his mattress at the residence. RITCHIE estimated that there were approximately 100 pictures of child pornography on the phone and that some of the images depicted children as young as 7.

19. RITCHIE later told investigators that he masturbates to child pornography and acknowledged that he has thought about having sex with children while watching child pornography. RITCHIE stated that the last time he viewed child pornography was a few days prior to his arrest. When asked, RITCHIE admitted that in the last few days has fantasized

about having sex with 12 to 13 year old girls, but that he has also fantasized about having sex with girls as young as 8.

20. Multiple electronic devices were seized from RITCHIE's residence and later analyzed by the NYSP, to include a Samsung Galaxy phone (the SUBJECT PHONE) found underneath RITCHIE's mattress. The SUBJECT PHONE was found to contain Approximately 120 images of child pornography, including images depicting the sadistic and masochistic sexual abuse of children. Three examples of the child pornography found on the SUBJECT PHONE include:

- a. Screenshot_20211230-000326_Meet24: An image depicting two adult males sexually abusing an approximately two-year-old female toddler. One of the males is depicted ejaculating on the child's face, while the other male attempts to insert his penis into the child's anus.
- b. 245.jpeg: An image depicting a nude, prepubescent female sitting on a nude adult male. The child's vagina is seen just above the adult male's penis and there appears to be semen in and around the child's vagina.
- c. 251.jpeg: An image depicting an adult male attempting to have vaginal intercourse with an approximately 5-year-old female child.

21. The SUBJECT PHONE contains the trademark "Made in China" and has therefore travelled in and affecting interstate and foreign commerce.

Prior sexual abuse of children

22. During his interview with the NYSP, RITCHIE admitted that he sexually abused a 5 to 6-year-old girl on multiple occasions when he was approximately 22 years old. RITCHIE said this occurred while RITCHIE was living in Kansas and enlisted in the U.S. Army. When asked, RITCHIE stated that he inserted his finger into the child's vagina "a little bit." When asked if she touched his penis, RITCHIE stated that he put his penis by or near the child, but not "in her." RITCHIE said that this would happen when he was playing

video games in a bedroom with the victim. RITCHIE also stated that he thought the child wanted to experience this type of contact and described it as “a little exciting.” RITCHIE stated that he was investigated by the Army for these accusations but was unsure of the final disposition of any charges.

23. According to RITCHIE’s criminal history, he was arrested by the US Army for “Rape of an Adult by Force” and “Indecent Assault Upon a Child” on September 28, 2012. The NYSP made contact with the 62nd Military Police Detachment, Criminal Investigations Division, of Fort Drum, NY (Army CID). According to the Army CID, RITCHIE subjected at least three women and one child to sexual abuse on different occasions between June 2007 and September 2012. The case resulted in a conviction with judicial action, general court martial, a bad conduct discharge, and confinement.

24. The women were generally acquaintances of RITCHIE, to include his former spouse, and the allegations ranged from unwanted touching and sexual advances to the forcible rape of his former spouse.

25. Based on records provided by the Army CID, the child for which RITCHIE was convicted was a 10 to 11-years old, as opposed to the 6 to 7-year-old child that RITCHIE described to the NYSP. In addition, the offense conduct involving the 10-11 year-old reported by the Army was different than what RITCHIE described to the NYSP. Accordingly, it is believed that RITCHIE may have sexually abused more than one child while enlisted in the Army and that he admitted to the NYSP to abusing a child that was not already known by law enforcement. This information was conveyed to the Army CID, who is in the process of conducting further investigation to determine whether RITCHIE victimized a second child while enlisted in the Army.

26. RITCHIE also told the NYSP that he kissed another 6 to 7-year-old girl in Wolcott, NY. RITCHIE described that victim as being the goddaughter of his sister. RITCHIE advised this incident may have been investigated but that he was unsure of the outcome.

27. According to records provided by the Wayne County Sheriff's Office (WCSO), RITCHIE was investigated in 2016 after he engaged in sexually explicit communications on Meet24 with a previous undercover NYSP investigator, who RITCHIE believed was a 14 year-old girl. As in this case, RITCHIE's user name was "j" while communicating with the UC. The case was ultimately fielded to the WCSO for follow up investigation. The WCSO interviewed RITCHIE on March 24, 2016, who provided a written statement concerning his interactions with the UC in that case. In the written statement RITCHIE admitted, among other things, that he has "a strong attraction to females 13 years-old and up" and that he in fact engaged in sexual conduct with a 7-year-old child in which he kissed her on the mouth and rubbed her vagina through clothing for approximately 30 minutes while in Wolcott, New York. This appears to involve the child that RITCHIE described in paragraph 26 above. The victim interviewed in that case but did not make a clear disclosure of sexual abuse. According to records provided by the WCSO, it appears that RITCHIE was allowed to plead guilty to a sex offender registration violation and was not charged with sexually abusing the 7 year-old child. HSI is following up with the WCSO to obtain further information concerning that victim.

28. In addition to the above, on February 8, 2017, RITCHIE was arrested by the New York State Police for Rape in the 3rd Degree in violation of New York Penal Law § 130.25 for engaging in sexual intercourse with a 16-year-old female, when RITCHIE was

approximately 31 years old. On July 28, 2017, RITCHIE pled guilty to Rape in the 3rd Degree and was sentenced to serve 3 years in NYS prison followed 10 years of post release supervision.

29. Records further showed that prior to his 2017 conviction, RITCHIE was already classified as a Level 2 sex offender based on his convictions with the U.S. Army. He was elevated to a Level 3 sex offender (highest risk level) following his latest conviction of Rape in the 3rd Degree.

Meet24 Search Warrant

30. On March 28, 2022, the NYSP applied for and received a search warrant for the Meet24 accounts associated with RITCHIE'S IP address, and the user names "j" and "o."

31. The records provided by Meet24 showed communications in which RITCHIE distributed and received child pornography as defined by 18 U.S.C § 2256(8) with other Meet24 users. The records also revealed communications between RITCHIE and the UC related to this investigation, as well as communications between RITCHIE and other Meet24 users who claimed to be minors.

32. Most of the communications began with RITCHIE determining the other person's age. RITCHIE would then typically ask if they had any daughters, younger sisters, and/or if they had ever engaged in sexual activity with another family member. In many instances, RITCHIE attempted to trade images of child pornography, engage in conversation involving the sexual abuse of minors, or discuss how he would like to sexually abuse his 7-year-old niece. Examples of these types of communications include:

<u>From</u>	<u>To</u>	<u>Date</u>	<u>Message</u>
RITCHIE	Unknown User	12/22/2021	hi how are you
RITCHIE	Unknown User	12/22/2021	do u have any kids

Unknown User	RITCHIE	12/22/2021	i do not
RITCHIE	Unknown User	12/22/2021	any little sisters
Unknown User	RITCHIE	12/22/2021	yes
RITCHIE	Unknown User	12/22/2021	how old
Unknown User	RITCHIE	12/22/2021	9, 13, 16, and 21
RITCHIE	Unknown User	12/22/2021	any pics of them
RITCHIE	Unknown User	12/22/2021	any pics of ur little sisters
RITCHIE	Unknown User	12/22/2021	do u want me do anything sexual to any of ur little sisters
RITCHIE	Unknown User	12/22/2021	do u want me to leave you alone n stop talking to u

33. In another chat, RITCHIE talked about sexually abusing a five-year-old girl:

From	To	Date	Message
RITCHIE	Unknown User	6/5/17	any pics of her
Unknown User	RITCHIE	6/5/17	no
RITCHIE	Unknown User	6/5/17	any pics of lil girls
Unknown User	RITCHIE	6/5/17	no u?
RITCHIE	Unknown User	6/5/17	no
Unknown User	RITCHIE	6/5/17	tell me your story
RITCHIE	Unknown User	6/5/17	rubbed a marker on her pussy
Unknown User	RITCHIE	6/5/17	mmmm how old
RITCHIE	Unknown User	6/5/17	5

34. In another chat, RITCHIE talked about wanting to be alone with a 3-year-old child:

From	To	Date	Message
RITCHIE	Unknown User	6/1/17	if I had a way to get a 3-year-old alone I could get some lol
RITCHIE	Unknown User	6/1/17	Unknown image sent
Unknown User	RITCHIE	6/1/17	lol.
Unknown User	RITCHIE	6/1/17	that one caught my attention! i soooooooo wish i was her! lol
RITCHIE	Unknown User	6/1/17	do u know a way I could get a 3-year-old alone lol
RITCHIE	Unknown User	6/1/17	Unknown image sent

RITCHIE	Unknown User	6/1/17	do u have any younger sisters
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35. In another conversation, RITCHIE talked with another user about wanting to sexually abuse his own niece:

From	To	Date/Time	Text
RITCHIE	Unknown User	7/1/2017	hi
RITCHIE	Unknown User	7/1/2017	have a niece lol
Unknown User	RITCHIE	7/1/2017	lol
RITCHIE	Unknown User	7/1/2017	but no way to turn her into a lil slut
Unknown User	RITCHIE	7/1/2017	o ic
RITCHIE	Unknown User	7/1/2017	do u have a way i. could lol
Unknown User	RITCHIE	7/1/2017	idk what she look lije
RITCHIE	Unknown User	7/1/2017	**Image sent believed to be RITCHIE's niece**
RITCHIE	Unknown User	7/1/2017	any way i could turn her into a slut lol
RITCHIE	Unknown User	7/1/2017	thats my niece
Unknown User	RITCHIE	7/1/2017	cute
RITCHIE	Unknown User	7/1/2017	thanks she is 3
Unknown User	RITCHIE	7/1/2017	nice
RITCHIE	Unknown User	7/1/2017	do u want me do anything sexual with ur niece or sister
Unknown User	RITCHIE	7/1/2017	did you do anything to her
RITCHIE	Unknown User	7/1/2017	to who
Unknown User	RITCHIE	7/1/2017	ur niece
RITCHIE	Unknown User	7/1/2017	no
Unknown User	RITCHIE	7/1/2017	want to
RITCHIE	Unknown User	7/1/2017	kinda
Unknown User	RITCHIE	7/1/2017	like what
RITCHIE	Unknown User	7/1/2017	everthing
Unknown User	RITCHIE	7/1/2017	nice
RITCHIE	Unknown User	7/1/2017	but cant ever get her alone and dont want to get in trouble if i did anything
Unknown User	RITCHIE	7/1/2017	what would u do
RITCHIE	Unknown User	7/1/2017	everything
Unknown User	RITCHIE	7/1/2017	like what
RITCHIE	Unknown User	7/1/2017	lick n finger her pussy
Unknown User	RITCHIE	7/1/2017	thats hot
RITCHIE	Unknown User	7/1/2017	do u want me fuck ur sister or niece

RITCHIE	Unknown User	7/1/2017	if we had a daughter would u want me to fuck her
Unknown User	RITCHIE	7/1/2017	yes
RITCHIE	Unknown User	7/1/2017	to which question
Unknown User	RITCHIE	7/1/2017	our daughter
RITCHIE	Unknown User	7/1/2017	at what age
Unknown User	RITCHIE	7/1/2017	2
RITCHIE	Unknown User	7/1/2017	really
Unknown User	RITCHIE	7/1/2017	yea
RITCHIE	Unknown User	7/1/2017	why
Unknown User	RITCHIE	7/1/2017	u wouldnt
RITCHIE	Unknown User	7/1/2017	idk
Unknown User	RITCHIE	7/1/2017	while shes breastfeeding
RITCHIE	Unknown User	7/1/2017	ok

36. During another conversation via Meet24, RITCHIE communicated with an individual who claimed to be a 14-year-old girl. RITCHIE asked her to send him a picture of her “pussy.” RITCHIE subsequently received image “file-172483484” which depicted the vagina of a young female.⁴

From	To	Date	Text
RITCHIE	Unknown User	11/6/2021	hi how are you
Unknown User	RITCHIE	11/6/2021	Good you
RITCHIE	Unknown User	11/6/2021	r u really 18
Unknown User	RITCHIE	11/6/2021	No
RITCHIE	Unknown User	11/6/2021	how old are you
Unknown User	RITCHIE	11/6/2021	14
RITCHIE	Unknown User	11/6/2021	where u live
Unknown User	RITCHIE	11/6/2021	Austria
RITCHIE	Unknown User	11/6/2021	ok
RITCHIE	Unknown User	11/6/2021	r u home alone
Unknown User	RITCHIE	11/6/2021	Yess
RITCHIE	Unknown User	11/6/2021	show me
RITCHIE	Unknown User	11/6/2021	will u do whatever I want u to do
Unknown User	RITCHIE	11/6/2021	Yess
RITCHIE	Unknown User	11/6/2021	then show me ur pussy

⁴ It is unknown if this image constitutes child pornography.

Unknown User	RITCHIE	11/6/2021	**Image sent depicting the vagina of a young female**
RITCHIE	Unknown User	11/6/2021	put something in ur pussy n show me

37. In another conversation, RITCHIE talked with an individual claiming to be a 13-year-old female. RITCHIE asked this female to produce and send him a picture of her “pussy” and discussed sexually abusing his niece:

From	To	Date	Message
RITCHIE	Unknown User	11/3/21	my niece is 7
Unknown User	RITCHIE	11/3/21	ohh cool
RITCHIE	Unknown User	11/3/21	do u want me put my dick in ur pussy n fuck u or my sister or niece
Unknown User	RITCHIE	11/3/21	im on sc where r u
RITCHIE	Unknown User	11/3/21	ny
Unknown User	RITCHIE	11/3/21	i gotta go 2 bed talk 2 u 2morrow
RITCHIE	Unknown User	11/3/21	ok can u send a pic of ur pussy
Unknown User	RITCHIE	11/3/21	i dnt hve 1
RITCHIE	Unknown User	11/3/21	take a pic of ur pussy
Unknown User	RITCHIE	11/3/21	myb 2morrow im goin bed kk
RITCHIE	Unknown User	11/3/21	ok do u want me put my dick in my niece n fuck her

37. RITCHIE also successfully traded child pornography with other Meet24 users in violation of 18 U.S.C. § 2252A(a)(2)(A). One such instance occurred between December 21, 2021 and December 27, 2021:

From	To	Date	Message
RITCHIE	Unknown User	12/21/21	hi
Unknown User	RITCHIE	12/21/21	Hello
Unknown User	RITCHIE	12/21/21	You have photos of little girls
RITCHIE	Unknown User	12/21/21	how old are you
Unknown User	RITCHIE	12/21/21	If You can send me some photos of little girls please
RITCHIE	Unknown User	12/21/21	one for one

RITCHIE then proceeded to distribute 6 images of child pornography to the other user in exchange for 5 images of child pornography in violation of 18 U.S.C. § 2252A(a)(2)(A).

Three of the images that RITCHIE distributed in this exchange are as follows:

- a. Image File 176741379 – This image depicts a nude approximately 6-year-old female being subjected to vaginal intercourse by an adult male.
- b. Image File 176603515.jpg – This image depicts a minor female lying on her back on a light blue blanket. The child is wearing a white shirt and no clothing below her waist. The child's legs are bent forward exposing her vagina and anus in a lascivious manner.
- c. Image File 176603534.jpg – This image depicts a minor female approximately 8 years old lying on her back on what appears to be a white pillow. An adult male appears to be ejaculating on the child's chest.


Three images that RITCHIE received in this exchange are as follows:

- a. Image File 162059092.jpg – This image depicts a naked, minor female approximately 5 years old lying on her stomach on a green and blue blanket. An adult male is seen inserting his erect penis into her anus.
- b. Image File 176741400.jpg – This image depicts a minor female approximately 7 years old wearing a pink shirt and denim skirt. She is lying on her back on a tan blanket. The minor female's legs are spread open and her vagina is exposed in a lascivious manner.
- c. Image File 176741581.jpg – This image depicts a naked, minor female approximately 9 years old. An adult is depicted inserting his erect penis into the child's mouth.

38. Based on my review of the Meet24 search warrant results, RITCHIE distributed and received dozens of images of child pornography in this fashion with different Meet24 users in violation of 18 U.S.C. § 2252A(a)(2)(A).

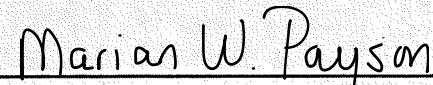
CONCLUSION

39. Based on the foregoing, I submit that there is probable cause to believe that Jacob RITCHIE, while in the Western District of New York, did knowingly violate 18 U.S.C. §§ 2251(a) (production and attempted production of child pornography); 2252A(a)(2)(A) (distribution, receipt, and attempted receipt of child pornography); and 2252A(a)(5)(B) (possession and attempted possession child pornography).



JUSTIN BURNHAM
Special Agent
Homeland Security Investigations

Affidavit submitted electronically by email in .pdf format. Oath administered, and contents and signature, attested to me as true and accurate telephonically pursuant to Fed. R. Crim. P. 4.1 and 4(d) on this 27 day of May, 2022.



MARIAN W. PAYSON
United States Magistrate Judge